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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION  
ARTHUR McKENZIE )  
 ) CIVIL ACTION  
VS. ) NO. 4:08-CV-002286  
 )  
PETROLEUM SERVICES CORPORATION )

\*\*\*\*\*

ORAL DEPOSITION OF  
ARTHUR McKENZIE, JR.  
JULY 22, 2009

\*\*\*\*\*

Reported by Phyllis Loy, CSR, RMR  
Job No. 77451

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1 ORAL DEPOSITION OF ARTHUR McKENZIE, JR.,  
2 produced as a witness at the instance of the  
3 Defendant, and duly sworn, was taken in the  
4 above-styled and numbered cause on JULY 22, 2009, from  
5 11:15 to 4:01, before Phyllis Loy, CSR in and for the  
6 State of Texas, reported by stenotype machine, at the  
7 offices of Davis & Associates, 1314 Texas Avenue,  
8 Suite 608, Houston, Texas, pursuant to the Federal  
9 Rules of Civil Procedure.  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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ALSO PRESENT: Ms. Marsha P. Ramsey

20  
21  
22  
23  
24  
25

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1 ARTHUR MCKENZIE, JR.,  
2 having been first duly sworn, testified as follows:  
3 EXAMINATION  
4 BY MR. KIGGANS:  
5 Q. Would you state your full name, please. 11:15  
6 A. Full name is Author Vennous McKenzie, Jr.  
7 Q. Your father has the same name except for the  
8 junior?  
9 A. Exactly.  
10 Q. Did he work as tankerman? 11:16  
11 A. No, he did not.  
12 Q. Do you know an Arthur McKenzie besides  
13 yourself that worked as tankerman?  
14 A. No, I do not.  
15 Q. Now, Mr. McKenzie, you're the plaintiff in 11:16  
16 the lawsuit that has been filed against Petroleum  
17 Service Corporation. Correct?  
18 A. Yes, that is correct.  
19 Q. We call it SGS. Now, do you understand if I  
20 say SGS, I'm talking about -- there was acquisition. 11:16  
21 I'll just explain it to you. A company called SGS  
22 acquired Petroleum Service Corporation. So if I say  
23 SGS, I'm still talking about Petroleum Service  
24 Corporation, the company you worked for. And I know  
25 sometimes we refer to Petroleum Service Corporation as 11:16

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1 PSC. So I'll try to clarify that as we go along, but  
2 if I say SGS, I'm still talking about the company you  
3 used to work for, that you sued in this case.  
4 Now, we introduced ourselves off the record.  
5 You are the plaintiff in the lawsuit that has been 11:17  
6 filed against Petroleum Service Corporation. Correct?  
7 A. That is correct.  
8 Q. Again, even though we have done this off the  
9 record, my name is Tom Kiggans. Sitting two people  
10 down from me is Drew Woellner. I forgot how to 11:17  
11 pronounce it. But we're both with the law firm of  
12 Phelps Dunbar. Do you know Marsha Ramsey, who is  
13 sitting directly to my left?  
14 A. Yes, I do.  
15 Q. She was the director of human resources for 11:17  
16 SGS at the time you were employed there.  
17 A. Yes.  
18 Q. Okay. And you've met Ms. Ramsey before?  
19 A. I believe, yes, I have. She came to Houston  
20 once and I met her there and I have spoken with her on 11:17  
21 the phone.  
22 Q. Okay. You're appearing here today pursuant  
23 to a notice to give your deposition in this case that  
24 you filed against SGS. And I want to go over some of  
25 the ground rules. Have you ever given a deposition 11:17

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1 before?  
2 A. No. This is my first time.  
3 Q. Well, just to explain, you are under oath.  
4 Even though we're in a conference room, it's just as  
5 if you were in a court of law so you're required to 11:18  
6 tell the truth.  
7 A. Okay.  
8 Q. Our purpose in taking your deposition is  
9 twofold. One is if your story changes between now and  
10 the time this case goes to trial, if it goes to trial, 11:18  
11 we would use that to impeach your creditability. Do  
12 you understand that?  
13 A. I do.  
14 Q. And our other purpose is to get a complete  
15 and accurate description of your claims so we want to 11:18  
16 do that. I don't want to cut you off. If I cut you  
17 off at any point, you can tell me. You're free to  
18 tell me, "I'm not through. I need to finish my  
19 answer." And by the same token if there will come a  
20 time in the deposition that I'll ask you questions 11:18  
21 like, "Is there anything else? Is there anything  
22 else," I'm not trying to belittle what you have  
23 already told me. It's that's the way that I like to  
24 get everything that you have that relates to your  
25 claims. 11:18

Pages 5 to 8

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1 A. Okay.  
2 Q. And one final rule. In that regard, in our  
3 attempts to get a complete and accurate description of  
4 your claims, if there is anything -- if there is a  
5 question that I don't ask -- that I ask that you don't 11:19  
6 understand, you can ask me to repeat it or rephrase  
7 it.  
8 A. Okay.  
9 Q. You'll do that?  
10 A. Yes, I will. 11:19  
11 Q. One other thing. You have done very well so  
12 far. In casual conversation we oftentimes say  
13 "uh-huh" or "huh-uh" or we shake our heads "yes" or  
14 "no" or something like that. That's not -- that  
15 doesn't come out well on a transcript. So there may 11:19  
16 be times, and I'm pretty good at remembering this, but  
17 if you say "huh-uh" or "uh-huh," I'll probably say,  
18 "Is that a 'yes' or is that a 'no'?"  
19 A. I understand.  
20 Q. That's my only purpose in doing that. And 11:19  
21 Drew is going to remind me if I don't do that  
22 sometimes. What is your date of birth?  
23 A. July of 30th, 1966.  
24 Q. Happy birthday almost.  
25 A. Almost. 11:19

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1 Q. What's your Social Security number?  
2 A. It's 380-86-2094.  
3 Q. And your driver's license number?  
4 A. 11574065.  
5 Q. And that's a Texas driver's license? 11:20  
6 A. Yes, that's correct.  
7 Q. Now, you still live -- what is your current  
8 address?  
9 A. 2326 South Beverly Circle.  
10 Q. Where? 11:20  
11 A. I'm sorry. Stafford, Texas. ZIP code is  
12 77477.  
13 Q. And how long have you lived there?  
14 A. I've lived there about -- over eight years.  
15 Q. And who lives there with you? 11:20  
16 A. My wife, Veronica McKenzie.  
17 Q. What's her maiden name?  
18 A. Veronica Calvin.  
19 Q. Anyone else live there?  
20 A. Yes. Brittany McKenzie is my daughter. 11:20  
21 Q. How old is she?  
22 A. She's 19. There is Ayanna McKenzie, B years  
23 old.  
24 Q. Is that a boy or girl?  
25 A. That's a female. 11:20

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1 Q. You said girl. Okay. Anyone else?  
2 A. No.  
3 Q. How long have you and Ms. Veronica McKenzie  
4 been married?  
5 A. Nine years -- coming up on nine years. 11:21  
6 Q. Ayanna is the child between the two of you?  
7 A. Yes.  
8 Q. And Brittany, does she have a different  
9 mother?  
10 A. No. 11:21  
11 Q. Have you been married before?  
12 A. No.  
13 Q. Have you been separated from Veronica before?  
14 A. Yes, I have.  
15 Q. When was that? 11:21  
16 A. I'm not really sure of the exact dates.  
17 Prior to us getting married, we were not together for  
18 about 10 years.  
19 Q. I knew in your personnel file with SGS there  
20 had been a child support order. 11:21  
21 A. Yes. There is child support for her, but I'm  
22 paying child support for a son also.  
23 Q. Okay. And who is that?  
24 A. That's Dante McKenzie.  
25 Q. And who is his mother? 11:22

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1 A. Bernice Conrad.  
2 Q. And how old is Dante?  
3 A. Dante is 13.  
4 Q. Do you still pay child support for him?  
5 A. Yes, I do. 11:22  
6 Q. And how much is that?  
7 A. I'm paying \$400 a month.  
8 Q. Where does he live?  
9 A. He lives at 6727 Briargate Drive, Missouri  
10 City, Texas, 77489. 11:22  
11 Q. Missouri City is where my first two children  
12 were born.  
13 A. Okay.  
14 Q. He lives there with his mother?  
15 A. Yes, he does. 11:22  
16 Q. Do you have any other children besides these  
17 three?  
18 A. No. That is it.  
19 Q. I understand you're currently -- although you  
20 live in Stafford, do you currently work in New York? 11:22  
21 A. I currently work out of the New York office.  
22 Q. Who do you work for?  
23 A. I work for Bouchard Transport.  
24 Q. Can you spell that?  
25 A. B-o-u-c-h-a-r-d. 11:22

Pages 9 to 12

## ORAL DEPOSITION OF ARTHUR MCKENZIE, JR.

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1 Q. What do you do for Bouchard Transport?  
 2 A. I am a barge mate/tankerman.  
 3 Q. How long have you worked for Bouchard?  
 4 A. In October it will be two years.  
 5 Q. So you started in October of '07? 11:23  
 6 A. Yes.  
 7 Q. What is your current rate of pay?  
 8 A. I'm making 290 a day.  
 9 Q. And how many days a month do you work?  
 10 A. I work 30 days on, 15 days off. 11:23  
 11 Q. Do you remember what your earnings were in  
 12 2008?  
 13 A. 2008 was the same rate.  
 14 Q. I know. But for the whole year?  
 15 A. For the whole year. 11:23  
 16 Q. Do you --  
 17 A. I don't have that exact. I don't have that  
 18 information.  
 19 Q. Can you give us an estimate?  
 20 A. I would say 70, 70,000. 11:23  
 21 Q. You're making more with Bouchard than you  
 22 were making for SGS?  
 23 A. Yes, that's correct.  
 24 Q. You have been making about 70,000 a year  
 25 since you started with them? 11:24

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1 A. Yes.  
 2 Q. Have you had any pay increases?  
 3 A. Yes, I have.  
 4 Q. And what are those?  
 5 A. It's been -- that depends on which boat I'm 11:24  
 6 working on. I've been upgraded to third mate, which  
 7 puts me at 311 a day. And that depends on if I'm  
 8 working with another mate. We're like shorthanded so  
 9 when I'm working as what they call the third mate, I'm  
 10 making 311. It depends on who comes in. There is 11:24  
 11 people who have been there longer and have a different  
 12 endorsement. So when they are on, they bump me back  
 13 to like entry-level pay.  
 14 Q. What endorsements are you talking about?  
 15 A. I'm talking about like an able-bodied seaman. 11:24  
 16 Q. These are Coast Guard endorsements?  
 17 A. Yes.  
 18 Q. When did you get your AB -- I'll call it AB.  
 19 A. I don't have my AB.  
 20 Q. What endorsements do you currently have with 11:25  
 21 the Coast Guard?  
 22 A. I have a Tank PIC.  
 23 Q. That stands for person in charge?  
 24 A. Person in charge, with an OS.  
 25 Q. What's OS? 11:25

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1 A. OS means ordinary seaman with a DL, which is  
 2 dangerous liquid. There's some more.  
 3 Q. Do you still have your card?  
 4 A. Yes, I do. I just renewed it also. That's  
 5 it. 11:25  
 6 Q. Let the record reflect Mr. McKenzie has just  
 7 handed me a copy of his Coast Guard card -- Coast  
 8 Guard card. On the front it has his picture and  
 9 titled U.S. Merchant Mariner's Document. And this one  
 10 actually says it expires February 25, 2010. You just 11:25  
 11 had this updated, though?  
 12 A. I just went to the Coast Guard's office to  
 13 get the process going. It takes about five or six  
 14 months after the background checks and various  
 15 information. 11:26  
 16 Q. I'm sorry. I didn't mean to interrupt you.  
 17 As I understand, these cards are issued for five  
 18 years.  
 19 A. Yes, they are for five years.  
 20 Q. This is the card -- the card that you just 11:26  
 21 handed me is the card you got upon completion of the  
 22 Tankerman Career Academy sponsored by Petroleum  
 23 Services?  
 24 A. That's correct.  
 25 Q. And on the back -- let me just -- I'm a 11:26

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1 little bit out of order, but that's okay. It's not  
 2 going to matter on the record. I'm going to hand to  
 3 you and your attorney here.  
 4 MR. KIGGANS: Ms. Tackett, I'm going to  
 5 tell you I have copies for you, but you may want to 11:26  
 6 rewrite the exhibit numbers on them because the  
 7 exhibit sticker on some of these is the exhibit  
 8 sticker used with the Statement of Position to the  
 9 Equal Employment Opportunity Commission. But for the  
 10 deposition, I've renumbered them. What I'm handing to 11:27  
 11 you says "Exhibit 8" on the bottom, but for the  
 12 deposition it's going to be Exhibit 4. I know that's  
 13 confusing, but I've just written over mine and put a 4  
 14 there.  
 15 (McKenzie Exhibit 4 marked.) 11:27  
 16 Q. Mr. McKenzie, I've handed to you what I have  
 17 re-marked as Deposition Exhibit No. 4, which I  
 18 think -- please verify for me -- is that a correct  
 19 copy of the card that you have just handed me?  
 20 A. Yes, it appears to be correct. 11:27  
 21 Q. The top of it is the front of your card and  
 22 underneath that actually copied upside down is the  
 23 back of your card. Correct?  
 24 A. That is correct.  
 25 Q. And this would have been issued -- if they 11:27

Pages 13 to 16

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1 are for five years, this would have been issued in  
2 February of 2005.  
3 A. Yes, I would like to say that from my  
4 recollection.  
5 Q. How did you go about renewing this card? 11:28  
6 A. You have to get an application, fill out the  
7 application, also bring a letter. I had to bring a  
8 letter from Bouchard, which is called a sea letter. I  
9 filled that out. And I guess from that point on they  
10 send it off to Virginia, I believe, and it's just a 11:28  
11 long process. But it's an application for renewal.  
12 Q. You went about doing the application yourself  
13 this time?  
14 A. Yes, I did. You have to take a physical.  
15 And with the physical, they took a urine analysis. 11:28  
16 You have to take a physical in order to renew. So I  
17 just took care of all that.  
18 Q. You did it yourself?  
19 A. Well, they send you to a clinic to go. So  
20 you go get an application. You fill out that 11:29  
21 application. They send you to a Coast Guard-approved  
22 clinic where you do the physical for the Coast Guard.  
23 You bring those results back and you submit it to the  
24 Coast Guard office, along with your application.  
25 Q. Okay. 11:29

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1 A. And then you wait for the processing, which  
2 is about five, six months.  
3 Q. I guess my question is: Did you do that  
4 yourself or did Bouchard do that for you?  
5 A. No. I did that myself. 11:29  
6 Q. What Coast Guard office did you go to?  
7 A. I went to the one on 45 and I want to say  
8 Monroe. I don't know the exact location of the  
9 address. It's here in Houston.  
10 Q. Now, the endorsements, let's look at 11:29  
11 Exhibit 4. I'm going to have to turn it over since  
12 the back side is copied upside down. But the  
13 endorsements are the fourth line down. Correct? That  
14 starts with --  
15 A. Yes, that is correct, Tank-PIC. 11:29  
16 Q. -- Tank-PIC. And that's the endorsement that  
17 you said stands for Tankerman Person in Charge?  
18 A. Yes.  
19 Q. That's the endorsement that enables you to  
20 work as a tankerman. Correct? 11:30  
21 A. That works as tankerman.  
22 Q. Then in parentheses it says "(barge-DL).  
23 That's a separate endorsement?  
24 A. No. It's same endorsement. What that does  
25 is allows me to work on barges that are considered to 11:30

Page 19

1 have dangerous liquids.  
2 Q. And then the OS is the one for ordinary  
3 seaman?  
4 A. Yes.  
5 Q. What is the wiper? What does that mean? 11:30  
6 A. That I'm not sure.  
7 Q. What about the SD(FH)?  
8 A. The FH means -- I know the FH stands for fire  
9 something. I'm not sure what the SD is for.  
10 Q. But all of these endorsements were the ones 11:30  
11 that you got upon completion of the Tankerman Career  
12 Academy with Petroleum Service Corporation?  
13 A. That is what I did receive.  
14 Q. How many of these endorsements do you use on  
15 your current job? 11:30  
16 A. The OS allows me access to the marine  
17 industry as being ordinary seaman. I currently do  
18 dangerous liquid, transporting six oil, gasoline,  
19 which is considered dangerous liquids. Those are the  
20 two that -- and being a PIC, being able to sign the 11:31  
21 DOI, Declaration of Inspection, as a document that's  
22 mandatory from the Coast Guard in order to start a  
23 load or discharge.  
24 So I would say the Tankerman-PIC with the DL  
25 and the OS allows me to do what I do now. 11:31

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1 Q. Do you actually do the loading and unloading  
2 now or are you working more as an able-bodied seaman?  
3 A. No. I do it from finish to start.  
4 Q. You do it all?  
5 A. I do all of it. 11:31  
6 Q. Did you do any of the able-bodied seaman work  
7 with Petroleum Service Corporation?  
8 A. No.  
9 Q. Or were you acting as a temp?  
10 A. No. Actually, to get an AB, you have to take 11:32  
11 additional courses, which I'm scheduled to take that  
12 here soon. All that would do is -- in order to become  
13 an AB, you have to have so many hours at sea. So when  
14 I was at PSC, I didn't qualify for an AB. You have to  
15 get sea time. 11:32  
16 Q. I apologize. You said that at the beginning.  
17 You're not -- you don't have the AB?  
18 A. I don't have an AB yet. If I did have an AB,  
19 then my rate would change, my rate of pay. As you get  
20 more endorsements per your MMD, it allows you to make 11:32  
21 more money because you're qualified to do more work.  
22 Q. What does the OS endorsement permit you to  
23 do?  
24 A. An OS is pretty much entry level. It allows  
25 you to even be able to work out offshore. I could 11:32

Pages 17 to 20

## ORAL DEPOSITION OF ARTHUR MCKENZIE, JR.

## Page 21

1 be -- you could being a deckhand. I mean, you do have  
 2 to have an OS to be able to even be in the marine  
 3 industry in order work on board a boat or ship.  
 4 Q. Help me. I'm not real familiar with the  
 5 marine industry. I know some about it. But the OS 11:33  
 6 entitles you to work on the vessels offshore.  
 7 Correct?  
 8 A. Offshore or shoreside also.  
 9 Q. Do you need that to be a tankerman that works  
 10 dockside that simply loads? 11:33  
 11 A. I believe you have to have the Tankerman-PIC.  
 12 Ordinary Seaman, that's all that stands for. That is  
 13 almost like a entry-level endorsement that is  
 14 stenciled on your license in order to have access to  
 15 the marine industry. 11:33  
 16 Q. In the two years you have worked or  
 17 approximately two years you have worked for Bouchard.  
 18 have you had any opportunities to deal with liquefied  
 19 gases?  
 20 A. No, I have not been able to. 11:33  
 21 Q. Does Bouchard load or unload liquefied gases?  
 22 A. No, they do not.  
 23 Q. Why is that?  
 24 A. They just don't have the contract for it.  
 25 I've heard that there is talks of them looking to get 11:34

## Page 22

1 into that business. And it's in, I guess, the  
 2 coordinating stages now. But when I hired on, if I  
 3 had an LG and they perform LG-type work, then I would  
 4 be able to qualify or I could apply specifically for  
 5 that. 11:34  
 6 Q. And how would you do that?  
 7 A. Looking at their job openings. If it's a  
 8 liquefied gas-type tankerman that they need, then if I  
 9 had an LG endorsement, I could apply for that  
 10 particular piece of equipment and work specifically 11:34  
 11 liquefied gas. There are companies out there that do  
 12 strictly liquefied gas.  
 13 In my pursuit in moving on as far as the  
 14 marine industry, I was unable to apply for liquefied  
 15 gas tankerman because I wasn't qualified to do that, 11:34  
 16 because I didn't have the endorsement on my MMD. So I  
 17 could only do dangerous liquids as a tankerman.  
 18 Q. What is your understanding -- well, let me  
 19 ask you another question.  
 20 Besides Bouchard, you worked for one other 11:35  
 21 company subsequent to the time of your employment --  
 22 A. Yes.  
 23 Q. -- with Petroleum Services Corporation ended.  
 24 Correct?  
 25 A. Yes. 11:35

## Page 23

1 Q. What company was that?  
 2 A. That Was Crowley. I was in the Western  
 3 Alaska division.  
 4 Q. You actually went to Alaska?  
 5 A. Yes, I did. 11:35  
 6 Q. When did you work for Crowley?  
 7 A. I don't have those dates exactly. I only  
 8 worked for them for -- I believe it was three months.  
 9 but I don't have the dates exactly in front of me.  
 10 Q. What was the reason your employment with 11:35  
 11 Crowley ended?  
 12 A. Actually, I had a death in the family and I  
 13 was still in the probationary period. And so when I  
 14 left because of the death of in family -- I had -- my  
 15 grandmother passed. So when I went home, it was 11:35  
 16 pretty much at the tail end of the season. That was  
 17 just seasonal work.  
 18 When you work in Alaska, it gets so cold  
 19 there. So they only need you for a short period of  
 20 time. I kind of came in at mid-season. If I was to 11:36  
 21 hire on the full season, I probably would have been  
 22 working there maybe five or six months.  
 23 But at any rate, we were kind of at the tail  
 24 end of the season. Because I took that leave of  
 25 absence or whatever, they just did not call me back. 11:36

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1 But I am still currently active with Crowley.  
 2 And when the new season came up, I could have  
 3 went back to Crowley if I wish to do so, but I had  
 4 already found a job here in New York. So meaning I'm  
 5 still on an active, good-standing employee with 11:36  
 6 Crowley. I just didn't accept the position to go back  
 7 afterwards.  
 8 Q. Okay. Your employment with Petroleum Service  
 9 Corporation ended in February of '07. Correct?  
 10 A. Yes. 11:36  
 11 Q. So you worked for Crowley for about three  
 12 months. You think it was within three or four months  
 13 after your employment with PSC ended?  
 14 A. Yes, I want to say -- you know what? It was  
 15 in June. I hired on with Crowley in June. 11:37  
 16 Q. Then you started with Bouchard in October of  
 17 '07?  
 18 A. That same year, right, right. I want to say  
 19 it's the same year.  
 20 Q. So you have -- basically since your 11:37  
 21 employment with PSC ended, you have only had about  
 22 four months of unemployment?  
 23 A. Four months of unemployment, which I didn't  
 24 even file for unemployment. I was able to sustain. I  
 25 didn't have any financial problems or anything. I was 11:37

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1 good.  
2 Q. What was your rate of pay with Crowley?  
3 A. With Crowley, I was making 3 -- no. 285. I  
4 was making 285.  
5 Q. A day? 11:37  
6 A. A day.  
7 Q. Have you always been paid on a day rate?  
8 A. Yes. When you're offshore, it's pretty much  
9 the whole industry operates off of daily wages.  
10 Q. Did you work as a tankerman for Crowley as 11:38  
11 well?  
12 A. Yes, I did. I was the only tankerman in my  
13 fleet.  
14 Q. Did Crowley -- did they do any loading or  
15 unloading of liquefied gases? 11:38  
16 A. Not that I know of.  
17 Q. Isn't it true that in the tankerman industry,  
18 dangerous liquids make up about 90 to 95 percent of  
19 the transfers that are done, or do you know?  
20 A. I can't say that because I don't know. I'm 11:38  
21 not sure. But there is work in liquefied gas, just as  
22 well as dangerous liquids.  
23 Q. During the time that you were working for the  
24 Petroleum Service Corporation, how many transfers of  
25 liquefied gas -- do you know how many transfers -- how 11:38

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1 many jobs they got of transfers of liquefied gas?  
2 A. Repeat the question.  
3 Q. Yeah, that was a bad question. Thank you. I  
4 know you said that Bouchard doesn't do any transfers  
5 of liquefied gas. Crowley, as I understand, doesn't 11:39  
6 do liquefied gas transfers.  
7 A. I can't say that they don't.  
8 Q. You don't know?  
9 A. I'm not sure, because I hired on -- when I  
10 applied, it was for -- they were looking for an OS 11:39  
11 with a DL endorsement. So that's when I Googled or  
12 looked up Crowley from their home page to apply for a  
13 position, I was only applying for things that I  
14 qualified for. I have no idea whether they do it or  
15 not. I'm not sure. 11:39  
16 Q. Do you have any idea what percentage of PSC's  
17 work involved liquefied gases during the time you were  
18 working for them?  
19 A. No, I do not.  
20 Q. Do you know if it was increasing or 11:39  
21 decreasing during your employment?  
22 A. I heard that they had consistently had  
23 contracts with or dedicated runs of dangerous  
24 liquefied gas.  
25 Q. Who did you hear that from? 11:40

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1 A. That was just the talk amongst tankerman. I  
2 want to say it was in the area called Chocolate Bayou.  
3 There was a lot of liquefied gas there. Also, when I  
4 was in Corpus Christi, I understand even -- I'm not  
5 sure to this day. I was with the understanding from 11:40  
6 people in the Corpus Christi group that there was  
7 liquefied gas work in Corpus Christi, which sometimes  
8 they would transfer tankermen from Houston to Corpus.  
9 Q. Do you remember who told you that?  
10 A. I'm going to say Antonio Chandler, who was -- 11:40  
11 he was a tankerman at PSC at one time.  
12 Q. He wasn't a supervisor?  
13 A. No, no supervisor. I remember of an instance  
14 where there was liquefied work being done in Chocolate  
15 Bayou, where there was a tankerman who requested -- he 11:41  
16 was trying to get his LG endorsement as well. What he  
17 did, he had spoken with his supervisor to see if they  
18 could possibly send him to Chocolate Bayou because it  
19 was slow, where he can at least get the training.  
20 Q. And who was that? 11:41  
21 A. Mike Monroe.  
22 Q. Do you know who he requested that from?  
23 A. No, I do not. I would seem to think that  
24 would be his immediate supervisor, which --  
25 Q. Do you remember who it was? 11:41

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1 A. It's either Roman or -- who is the other guy?  
2 My supervisor is Dela Cruz. I can't think of the  
3 third supervisor's name at this point.  
4 Q. Mason Dela Cruz?  
5 A. Yeah. Mason was my mediate supervisor. 11:42  
6 Q. Was he your supervisor the entire --  
7 A. He was my supervisor the entire time.  
8 Q. One other rule about deposition, we're not  
9 supposed to talk over each other.  
10 A. I'm sorry. 11:42  
11 Q. That's okay. I was going to tell you to let  
12 me finish the question.  
13 A. Okay.  
14 Q. Just so our record is clear, Mason Dela Cruz  
15 was your supervisor the entire time you worked for 11:42  
16 Petroleum Service Corporation?  
17 A. Yes.  
18 Q. And you can see despite my instructions at  
19 the very beginning, I keep slipping back into calling  
20 it PSC instead of SGS. But we all know who we're 11:42  
21 talking about. I want to make sure we understand  
22 that.  
23 Do you know who worked at -- what tankerman  
24 worked for Petroleum Service Corporation at Chocolate  
25 Bayou? 11:42

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